

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

FILED IN CLERK'S OFFICE
U.S.D.C. Atlanta

JAN 17 2003

LUTHER D. THOMAS, Clerk
By:  Deputy Clerk

ERNEST MILLER,

Plaintiff,

v.

UNIVERSAL WRESTLING

CORPORATION f/k/a

WORLD CHAMPIONSHIP WRESTLING,

INC., TURNER SPORTS, INC.,

TURNER ENTERTAINMENT GROUP, .

INC. and TURNER BROADCASTING

SYSTEM, INC.,

Defendants.

Civil Action File No.:

1:02-CV-0773-CC

JOINT MOTION TO EXTEND DISCOVERY

COME NOW Plaintiff Ernest Miller and Defendants Universal Wrestling Corporation (f/k/a World Championship Wrestling, Inc.), Turner Sports, Inc., Turner Entertainment Group, Inc., and Turner Broadcasting System, Inc. and show this Court that they jointly agree that the parties need a reasonable extension of the discovery period of sixty (60) days to properly complete discovery in this action.

The parties specifically show the Court the following:

1.

The discovery period is currently set to expire on January 24, 2003.

2.

The parties have diligently cooperated in achieving considerable amounts of discovery in this case, including the deposition of Plaintiff and another witness. The parties are currently working to schedule the depositions of several other witnesses.

3.

The parties have been discussing the prospect of mediating the above-styled action.

4.

Counsel for the parties to this action also represent parties in the following related litigation (the "Related Litigation"):

Davis v. World Championship Wrestling, Inc. and Turner Sports, Inc., Civ. File No. 1-00-CV-1716-CC;
Saengsiphon v. World Championship Wrestling, Inc. and Turner Sports, Inc., Civ. File No. 1-00-CV-1719-CC;
Speight v. World Championship Wrestling, Inc. and Turner Sports, Inc., Civ. File No. 1-00-CV-1718-CC;
Worthen v. World Championship Wrestling, Inc. and Turner Sports, Inc., Civ. File No. 1-00-CV-1717-CC;
Reeves v. World Championship Wrestling, Inc. and Turner Sports, Inc., Civ. File No. 1-00-CV-1720-CC;
Easterling v. World Championship Wrestling, Inc. and Turner Sports, Inc., Civ. File No. 1-00-CV-1715-CC
Onoo v. World Championship Wrestling, Inc., Turner Sports, Inc., Civ. File No. 1:00-CV-0368-CC
Norris v. World Championship Wrestling, Inc., Turner Sports, Inc., Civ. File No. 1:00-CV-0369-CC
Walker v. World Championship Wrestling, Inc., Turner Sports, Inc., Civ. File No. 1:00-CV-0367-CC;

Patterson v. World Championship Wrestling, Inc., Turner Sports, Inc., Turner Entertainment Group, Inc., Civ. File No. Civ. File No. 1:01-CV-1152-CC.

Huffman v. World Championship Wrestling, Inc., Turner Sports, Inc., Turner Entertainment Group, Inc., Civ. File No. 1:02-CV-1637CC

5.

The Related Litigation is currently set on a briefing schedule for the submission of dispositive motions as follows:

(1) In Walker v. WCW, et al., 1:00-CV-CC; Norris v. WCW, et al., 1:00-CV-369-CC; and Onoo v. WCW, et al., 1:00-CV-368-CC, dispositive motions were due on December 17, 2002, with responses due on January 13, 2003, (for Walker and Norris), and January 15, 2003, (for Onoo), and replies due on January 30, 2003, (for Walker and Norris), and January 31, 2003 (for Onoo);

(2) In Davis v. WCW, et al., 1:00-CV-1716-CC; Worthen v. WCW, et al., 1:00-CV-1717-CC; and Reeves v. WCW, et al., 1:00-CV-1720-CC, dispositive motions were due on January 8, 2003, with responses due on January 30, 2003, and replies due on February 19, 2003;

(3) In Easterling v. WCW, et al., 1:00-CV-1715-CC; Speight v. WCW, et al., 1:00-CV-1718-CC; Saengsiphon v. WCW, et al., 1:00-CV-1719-CC; and Patterson v. WCW et al., 1:01-CV-1152-CC, dispositive motions are due on January 30, 2003, with responses due on February 24, 2003, and replies due on March 17, 2003.

Counsel for the parties have been diligently working to prepare and respond to these dispositive motions.

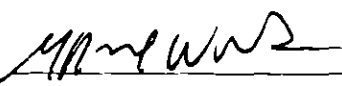
6.


The parties anticipate that they will be able to complete discovery by March 24, 2003.

7.

Accordingly, the parties specifically request this Court to issue an Order modifying the Magistrate Judge's Scheduling Order, such that the parties are permitted up to and including March 24, 2003 to complete discovery in these cases. The parties further request that all additional and related deadlines set out by the Magistrate Judge's Scheduling Order be similarly extended. A proposed Order is attached hereto as Exhibit "A."

Respectfully submitted, this 17th day of January, 2003.


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Kelly Jean Beard
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CERTIFICATE OF SERVICE

This is to certify that I have this date served opposing counsel to this action with the foregoing **JOINT MOTION TO EXTEND DISCOVERY** by depositing a copy of the same in the United States Mail with adequate postage, addressed as follows:

John J. Dalton
James Lamberth
Evan Pontz
Troutman Sanders LLP
Suite 5200, Bank of America Plaza
600 Peachtree Street, N.E.
Atlanta, Georgia 30308-22165

This 17th day of January, 2003.



Michelle M. Rothenberg-Williams

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

| | | |
|-------------------------------|---|------------------------|
| ERNEST MILLER, |) | |
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| Plaintiff, |) | |
| |) | Civil Action File No.: |
| v. |) | 1:02-CV-0773-CC |
| |) | |
| UNIVERSAL WRESTLING |) | |
| CORPORATION f/k/a |) | |
| WORLD CHAMPIONSHIP WRESTLING, |) | |
| INC., TURNER SPORTS, INC., |) | |
| TURNER ENTERTAINMENT GROUP, . |) | |
| INC. and TURNER BROADCASTING |) | |
| SYSTEM, INC., |) | |
| |) | |
| Defendants. |) | |
| _____ |) | |

ORDER

It appearing to the Court that the parties have jointly moved for a reasonable extension of the discovery period in this action, and for good cause shown, IT IS HEREBY ORDERED that this Court's Scheduling Order is amended so that the time within which the parties may complete discovery in these cases is extended through and including March 24, 2003, and that all additional and related deadlines set out by the Court's Scheduling Order are similarly extended.

SO ORDERED, this _____ day of _____, 2003.

JUDGE, U.S. DISTRICT COURT